

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
ARMADA MIDCONTINENT, LLC	§	CASE NO. 15-41557
	§	CHAPTER 7
	§	
DEBTOR	§	

**REQUEST FOR EMERGENCY HEARING ON
EMERGENCY MOTION TO APPROVE AGREED ORDER
REGARDING POST-PETITION FINANCING**

TO THE HONORABLE BRENDA T. RHOADES, U. S. BANKRUPTCY JUDGE:

Linda Payne, the duly qualified and acting Trustee herein, files this Request for Emergency Hearing pursuant to Local Rule of Bankruptcy Procedure 9007(b) as follows:

I.

BACKGROUND

1. On August 28, 2015, Debtor filed its Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Court (the "Petition Date") and Linda Payne was appointed interim trustee of the estate.

2. The Trustee has filed an Emergency Motion To Approve Agreed Order Regarding Post-Petition Financing (the "Financing Motion").

III.

RELIEF REQUESTED

3. The Debtor's primary assets consist of working interests in oil and gas properties in Woodson County, Kansas, together with various operating equipment, general intangibles, accounts receivable, and any fixtures.

4. The Debtor has ceased operation of its oil and gas wells in Woodson County, Kansas, and is generating no revenues. The Trustee intends to market and sell the Debtor's assets, but in the interim requires authority from this Court for Post-Petition Financing to pay preservation costs in order to preserve the value of the Debtor's assets through the date of the sale of the Debtor's assets.

5. The Trustee requests an emergency hearing on the Financing Motion.

WHEREFORE, PREMISES CONSIDERED, Trustee requests an emergency hearing on the Financing Motion and such other and further relief to which she may be justly entitled.

Dated: September 16, 2015

Respectfully submitted,
THE MOORE LAW FIRM, L.L.P.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the attached mailing matrix either through the court's electronic notification system as permitted by Appendix 5005 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid on September 16, 2015.

/s/ Bill F. Payne
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